

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

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: Chapter 9

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: Case No. 13-53846

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: Hon. Thomas J. Tucker

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**CITY OF DETROIT'S REPLY TO DETROIT WAYNE JOINT BUILDING  
AUTHORITY'S AMENDED OBJECTION TO AMOUNTS OF CURE AMOUNT  
CLAIMS IN CONNECTION WITH PROPOSED ASSUMPTION OF AGREEMENT**

The City of Detroit (“City”), by its undersigned counsel, Miller, Canfield, Paddock and Stone, PLC, files this Reply to the Amended Objection to Amounts of Cure Amount Claims in Connection with the Proposed Assumption of Agreements (Docket No. 9117) (“Objection”) filed by the Detroit Wayne Joint Building Authority (“DWJBA”). The City disputes the claims asserted by the DWJBA in their entirety because (1) all late fees are disputed and are not appropriate in view of the City's bankruptcy proceedings, (2) other amounts, including claims for capital projects, were not properly authorized and approved by the City or the Financial Review Commission and are disputed, and (3) the City has a substantial offset to the DWJBA's alleged claims based on City of Detroit/Public Lighting Department billings to the DWJBA. The City thus respectfully requests that the DWJBA's Objection be overruled.

March 3, 2015

Respectfully Submitted,

By: /s/ Marc N. Swanson  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 3, 2015, he served the foregoing **CITY OF DETROIT'S REPLY TO DETROIT WAYNE JOINT BUILDING AUTHORITY'S AMENDED OBJECTION TO AMOUNTS OF CURE AMOUNT CLAIMS IN CONNECTION WITH PROPOSED ASSUMPTION OF AGREEMENT** upon counsel as listed below, via electronic mail and First Class United States mail:

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March 3, 2015

By: /s/ Marc N. Swanson  
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